

**Columbia Falls Aluminum Company      Internal Correspondence**

**Date:            August 1, 1988**

**Subject:        EPA/STATE INSPECTION OF THE PLANT**

**From:           Ken Reick**

**To:             Don Ryan**

On July 27, 1988, two EPA people, Jay Sinnott and Chris Knutson, together with Warren Norton, of the Air Quality Bureau, performed an unannounced inspection of the plant. The reason for the inspection was an EPA audit of Air Quality Bureau compliance procedures. Or, put another way, the EPA was watching how the Air Quality Bureau watches us.

The inspection team monitored the roof emissions and most of the stacks in the plant for compliance with visible emission regulations. There is some question as to whether the roof emissions meet the 10% opacity standard. Application of the standard, through observation, is difficult because of the physical layout of the roofs. The inspection team suggested that the best approach to the situation would be to implement best operating practices in order to keep the emissions to a minimum. If this fails to bring about compliance, then some thought should be given to seeking a rule change.

Another problem with the 10% opacity standard is in the way it is written. Strictly interpreted, it applies to all emissions from the plant--not just the roofs. We have always assumed (and still do) that Section 16.8.1404, Visible Air Contaminants, of the Administrative Rules of Montana, apply to all other sources in the plant. The opacity standard for this rule is 40% for pre-1968 sources and 20% for post-1986 sources.

The paste plant mixer stack failed to meet the 40% standard and a citation was issued. Neither the Montana Clean Air Act nor the Administrative Rules of Montana requires that we respond to the citation. If we do not, however, the Air Quality Bureau will issue a notice of violation. The next steps would be fines and compliance schedules.

The proper response to the citation will be a letter to the bureau, stating how we intend to correct the problem. At some future time, we will also have to address the issue of best operating practices in the potlines and possible rule changes and rule clarification.

mcs: J. Broussard  
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